

CDBG-CV Technical Assistance

Please be sure to sign-in to receive credit for this training.



Agenda

Introduction Kellon

• CDBG-CV Basics Donielle

Release of Funds Jade

• Civil Rights Kellon

Procurement Jade

• LMI Tracking Donielle

OkGrants
 Kellon

Financial Management Kellon

Duplication of Benefits Jade

Monitoring Donielle

• Closeout Kellon

• Keys to Success Jade

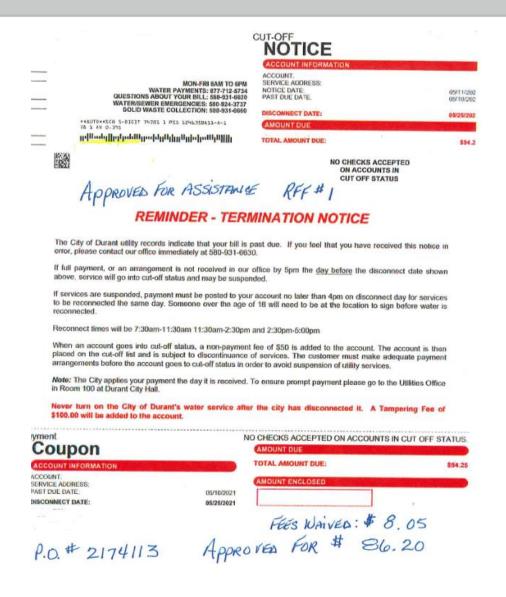


Project Eligibility:

- Eligible projects must benefit at least 51% LMI;
- Eligible projects must either prepare, prevent or respond to the Coronavirus outbreak (must show tie-back to COVID);
- Eligible projects must fit under the following categories:
 - Rental/Mortgage Assistance Beneficiaries must be past due on any bills they are seeking assistance for, and payment must go directly to the Landlord/Mortgage Company (Triggers the Lead-Based Paint Rule for over 100 days of assistance) Note: This rule applies after the first payment is made and going forward, not when the assistance started. For example, if paying arrears for three months, the 100-day period begins from the date of first payment, not the beginning of the three months;
 - **Utility Assistance** Beneficiaries must be past due on any bills they are seeking assistance for, and payment must go directly to the Utility Company. Note that if the utility is owned by the City, then they must waive late fees or any other fees that would **be considered as a profit** to the City;
 - Medical Assistance;
 - Mental Health Assistance:
 - Nutrition Assistance;
 - **Job Training Assistance** Literacy, independent living skills, resume writing, job coaching, job retention training;
 - Childcare Assistance Directly to the daycare or after-school service program, due to change in work hours, job changes, or other issues directly related to COVID-19 and generally offered only for children under the age of 13.; and
 - Rehabilitation Assistance Rehabilitation of a public facility to improve indoor air quality and ventilation to prevent the spread of Coronavirus.

Utility Payments

- Assistance for utilities should cover standard expenses. For example, late payment fees or loan fees should not be included in the assistance payment.
- If fees for utility bills are being waived, indicate whether these fees are simply being WAIVED by the city or PAID by the city on the bill.



Process for Eligible Activities:

- All grantees will be required to upload documentation for eligible activities that receive CDBG-CV funds to
 ensure compliance with Federal and State regulations. In order for a subrecipient application intake
 process to be considered effective for utility and rental/mortgage assistance, subsistence payment records
 must be verified by using the following criteria to ensure expenses are necessary and reasonable:
 - Low-to-Moderate-Income Benefit
 - Duplication of Benefits
 - Tieback to COVID-19 Pandemic
 - Loss of Income
 - Household Income
 - Late Payment Notices
 - Beneficiary Agreement to return back duplicative funds

Process for Eligible Activities:

- ODOC Forms
 - Householder Duplication of Benefits for Assistance Affidavit
 - Non-Profit Duplication of Benefits for Assistance Affidavit
 - Self-Declaration Form
 - Rent Reasonableness Check and Fair Market Rent Certification
 - Rental Agreement Plan Landlord Statement
 - CDBG-CV Equipment Inventory Form
 - Certification of Inventoried Items
 - Nutrition Assistance Application

Tieback to COVID-19:

- All activities must have a tieback to COVID-19:
 - COVID-19 Prevention:
 - Equipment, Chemicals, or Materials that stop the spread of COVID
 - COVID-19 Preparation:
 - Equipment, materials, chemicals or electronics in place to better maintain services through social distancing
 - COVID-19 Response:
 - Beneficiaries must document how they experienced income loss or related issue due to COVID-19 that caused the need for utility, rental, or mortgage assistance.

Tieback to COVID-19:

- Documentation of a tieback to COVID-19 can be any of the following, but is not limited to:
 - Statement of layoff or job loss;
 - Reduction in work hours due to COVID-19;
 - Reasoning for equipment or chemical purchase;
 - Statement from employer of business closure;
 - Bank statements showing reduction in weekly/monthly pay; or
 - Self-certification by beneficiary that the need was due to COVID-19.

Note: Self-certification is considered to be the lowest form of verification. While it is allowed, we strongly encourage subrecipients to do their due diligence in acquiring necessary documentation. If the self-certification method is used, a short narrative must be included stating a tieback to COVID and other related information to assist in determining eligibility.

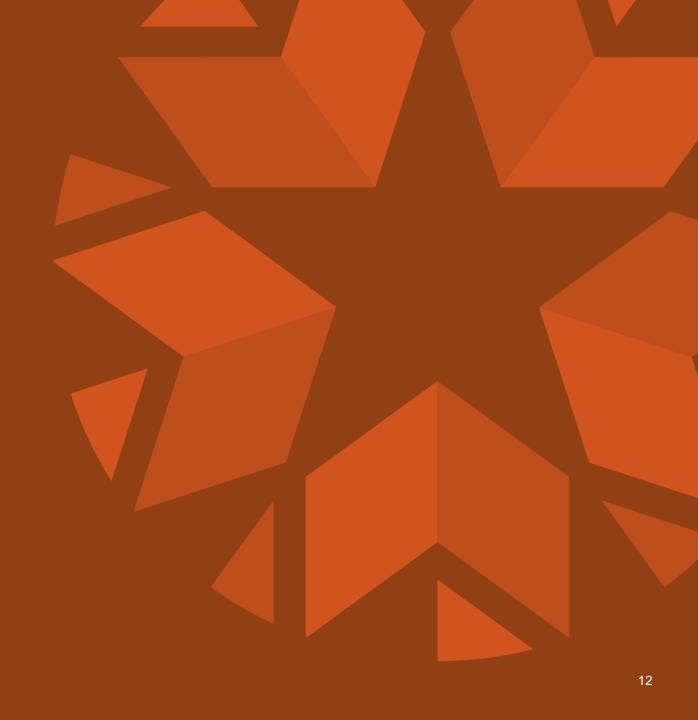
Keeping an inventory of supplies/equipment bought with CDBG-CV funds such as:

- Food;
- PPE;
- Chemicals;
- Other supplies for maintaining social distancing; and
- Equipment such as:
 - iPads and data plans;
 - Kitchen Machinery, Utensils, and Packing Supplies; and
 - Cleaning Products.

Emergency Payments - Covering Arrears

- Per Federal guidance, each assisted individual or family that is provided utility or rental/mortgage assistance for a period of multiple months, the period begins **on the date the first payment is made to a provider** on behalf of an individual or family. Thus, for rental/mortgage, or utility assistance, the following is required:
 - Assistance must be consecutive months;
 - Assistance must only be arrears (show of past due notice); and
 - Assistance can only be paid to the provider after the beneficiary is late on such payment.

Note: The period for emergency payments begins when the payment is made, not when the arrearage began. For example, an eligible applicant is 4 months in arrears. The first payment made will cover the 4 months of arrears. The applicant will still be eligible to receive 5 more months of assistance to fulfill the six consecutive month allowance.



- As with normal CDBG projects, subrecipients will be required to obtain Release of Funds (ROF) prior to drawing down any funds.
- Subrecipients will have <u>120 days</u> from the start date of their contract with ODOC/CD to obtain ROF and <u>270 days</u> from the start of their contract to begin construction.
- Subrecipients will be required to complete and upload the CDBG-CV ROF Checklist.
- To initiate release of funds (ROF), use the OKGrants Walkthrough located on the OKCommerce website. https://www.okcommerce.gov/community-development/local-governments-edos/okgrants-guides-logon/

Release of Funds Checklist Requirements:

- 1. CDBG-CV projects will mainly involve three (3) levels of Environmental Review:
 - Exempt Activities 24 CFR 58.34(a)- Ex. Grant Administration and Consultation
 - Categorically Excluded <u>not subject</u> To 58.5 Activities: Ex. Public Services and Equipment
 - Categorically Excluded Subject to 58.5 Activities: Ex. Rehabilitation of public facilities
- Sam.Gov Verification
 - ✓ Verification of Sam.Gov check
 - ✓ Grantee Debarment Review Certification
 - ✓ Contractor Debarment Review Certification
- 3. Leverage/Matching Funds
- 4. Insurance and Bonding
- 5. Anti-displacement Plan
- 6. Fair Housing Activity (CEST and EA Reviews)
- 7. Section 3 Resolution or Plan (CEST and EA Reviews)
- 8. Engineer/Architect Acknowledgement (CEST and EA Reviews)
- 9. Request Release of Funds (Form 7015.15) (CEST and EA Reviews)



Oklahoma Department of Commerce (ODOC) - Community Development Block Grant- CV Program Request for Release of Funds & Removal of Contract Conditions Checklist

For step by step instructions on how to Initiate Release of Funds in OKGrants visit https://www.okcommerce.gov/community-development/local-governments-edos/okgrants-guides-logon/. Complete Checklist below and upload applicable items with supporting documentation.

Grant Recipient Name:		
CDBG Contract Number:	Submitted	Reviewed
Describe Project(brief):	GRANTEE	ODOC ONLY
Determine Level of Environmental Review - Please complete separate environmental forms for each applicable activity & refer to the CDBG-CV Policy and Procedure Manual.		
 Exempt Activity - Complete and Upload Forms into OKGrants Part 58 Environmental Review–Exempt Activity (Attachment 12) 	1a.	1a.
*Be sure to <u>ONLY</u> include funds committed to Exempt Activities under Sec. 58.34 (a)(3) (i.e., Consulting, Engineering, Inspection/professional services)		
b. Contractor Debarment/Exclusion Review Cert (Attachment 24 & 25) Verify with DUNS # and upload _www.SAM.gov _verification	1b.	1b.
c. Procurement -Exempt Activities - UPLOAD RFP/RFQ & Service Contracts if applicable	1c.	1c.
2. Categorically Excluded NOT Subject to 58.5:		
a. Part 58 Environmental Review-Exempt-CENST Format (Attachment 12)	2a.	2a.
Complete and Upload Categorically Excluded Not Subject to Section 58.5		
Form (Pursuant to 24 CFR Part 58.35(b))		
*Be sure to ONLY include funds committed to Categorically Excluded activities under 58.35(b)(3) (ex.		
Purchase of Equipment) If your project does not		
include CEST activities,		
proceed to Other		
Requirements below.		

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	xcluded Subject To 58.3 ONLY include funds		hment 13)	3. CATEX Form	3. CATEX I
	r 58.35(a); (i.e., Replaceme				
curbs and sidewa	lks, repaving of streets)				
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	.okhistory.org/shpo/section1				
	.okhistory.org/shpo/tribal10				
	ical Survey Letter - https:/ anagement/agencies-and-a		nsurvey/cultural-	3b.	3b.
	After completing the				
	the activity convert to	o exempt at 58.	34 (a)(12)?		
STOP	IF YES, skip to comple	ete <u>Item f.</u> RRO	F 7015.15		
	IF NO, complete item	s c,d,e,f, as app	licable to the		
	activity: (activity imp				
	compliance/mitigatio	in to any relate	d authority)	3c.	3c.
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management/ Upload FE	MA FIRMette Map to in	nclude Panel No.	. & Date		
	Step Analysis (24 CFR Pa				
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4. Complete and Upload Environmental Assessment Form:	4. EA Form	4. EA Form
Environmental Assessment Checklist (<u>Attachment 14</u>):		
a. Historical Clearance Letter (SHPO & THPO) https://www.okhistory.org/shpo/section106.htm	4a.	4a.
https://www.okhistory.org/shpo/tribal106 b. Archaeological Survey Letter - https://www.ou.edu/archsurvey/cultural- resource-management/agencies-and-applicants	4b.	4b.
c. Floodplain Management- https://www.hudexchange.info/programs/ environmental-review/floodplain-management/ Upload FEMA FIRMette Map to include Panel No. & Date	4c.	4c.
Eight Step Analysis (24 CFR Part 55.20) <u>Upload or blank if N/A</u> : Early Notice (must be <u>published</u> one time, 15 day comment period) Final Notice (must be <u>published</u> one time, 7 day comment period) [Requirement N. 403 in Pap Manual]		
d. Combined Notice (Attachment 18) (Proof of Publication or Posting)	4d.	4d.
DIST LIST (<u>Attachment 17</u>) - Distribute the Notice to the appropriate e.	4e.	4e.
and upload with publication f. REQUEST RELEASE OF FUNDS - 7015.15 (Attachment 15)	4f.	4f.
OTHER REQUIREMENTS (if applicable)		
5. Leverage/Matching Funds- (<u>Attachment 20</u>): 1. UPLOAD Leverage Confirmation & supporting document as applicable.	5.	5.
6. Insurance & Bonding (as applicable) <u>UPLOAD</u> Items: Let Evidence of city/County general liability insurance coverage Let Evidence of city/County bonding	6.	6.
7. Anti-Displacement Plan (Attachment 22) 1. UPLOAD Executed Plan	7.	7.
Fair Housing Activity - <u>UPLOAD</u> one (1) activity: Refer to Policy and Procedure Manual - Policy 404	8.	8.
 Section 3 - if applicable <u>UPLOAD</u> Resolution & Plan adopted by sub-recipient: Refer to Policy and Procedure Manual - Policy 	9.	9.
404 10. Engineer Acknowledgment- (<u>Attachment 21</u>)	10.	10.
11. ODEQ Permit to Construct <u>-UPLOAD</u> for W/S Eng. Contracts & Part II Contract conditions a applicable - Leave blank if N/A	11.	11.

ODOC Reviewer Name & Title

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- 1. EXEMPT ACTIVITIES Professional Services
 - a) HUD or ODOC Form-Executed by Grantee's Chief Elected Official
 - b) Debarment Check:
 - 1. SAM.gov verification
 - 2. Grantee Debarment Review Cert.
 - Contractor Debarment Review Cert.
 - c) Procurement Documents (May also be uploaded drawdown request)
- CATEGORICAL EXCLUDED (Not Subject to 58.5) CENST -

(Purchase of a Fire Truck/Equipment)

- a) HUD or ODOC Form Executed by Grantee's Chief Elected Official
- b) Procurement Documents (May also be uploaded drawdown request)

Oklahoma Department of Commerce (ODOC) - Community Development Block Grant- CV Program Request for Release of Funds & Removal of Contract Conditions Checklist

For step by step instructions on how to Initiate Release of Funds in OKGrants visit https://www.okcommerce.gov/community-development/local-governments-edos/okgrants-guides-logon/. Complete Checklist below and upload applicable items with supporting documentation.

Grant Recipient Name: CDBG Contract Number: Describe Project(brief):	Submitted Items - GRANTEE	Reviewed Items – ODOC ONLY	
Determine Level of Environmental Rev separate environmental forms for each the CDBG-CV Policy and Procedure Man	4-		
 Exempt Activity - Complete and Upload Part 58 Environmental Review–Exempt Ad 		1a.	1a.
*Be sure to <u>ONLY</u> include funds committed to 58.34 (a)(3) (i.e., Consulting, Engineering, In			
b. Contractor Debarment/Exclusion Review	v Cert (<u>Attachment 24 & 25</u>) Verify	1b.	1b.
c. Procurement -Exempt Activities - UPLOAD RFP/RFQ & Service Contracts if applicable		1 c.	1c.
2. Categorically Excluded NOT Subject t	<u>o 58.5</u> :		
a. Part 58 Environmental Review-Exempt-CE		2a.	2a.
Complete and Upload Categorically Exclud	ed Not Subject to Section 58.5		
Form (Pursuant to 24 CFR Part 58.35(b)) *Be sure to ONLY include funds committed to Categorically Excluded activities under 58.35(b)(3) (ex. Purchase of Equipment) If your project does not include CEST activities, proceed to Other Requirements below.			

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3. CATEGORICAL EXCLUDED (Subject to 58.5) CEST -

Improvements to Existing Infrastructure such as Public Facilities

Complete CEST (HUD/ODOC Form) with information from prepared "Resource Worksheets" for each Federal Law & Authorities listed at 24 CFR 50.4, 58.5 & 58.6.

- a) Historical letters of concurrence (State & Tribal)
- b) Archaeological letter of concurrence
- c) Part of the review is **Floodplain** Management, the "Resource Topic Page & Worksheet" provides guidance to determine if the activity is located in the 100- or 500-year floodplain. If any portion of the project is located in the floodplain or wetland, a

5-step or 8-step review process shall be performed requiring two publications for public comment 1)Early Public Review & 2)Justification for locating project in a floodplain.

If no regulatory agency requires consultation or mitigation, the activity can convert to an exempt activity at 58.34(a)(12). No Notice to the Public is required and the Chief Elected Official executes the CEST Form. You may skip to f) Request for Release of Funds 7015.15

- **d)** Prepare & post a Notice of Intent to Request Release of Funds for Public Comment Period
- e) Distribute the Notice of Intent to interested parties
- **f)** Chief Elected Official **Certifies** the Review of all Environmental Documents Prepared and **Executes** the CEST and the 7015.15 Request for Release of Funds (HUD/ODOC Forms).

3. Complete and Upload Categorically Excluded Form:					
Categorically Excluded Subject To 58.35(a)(CEST) (Attachment 13)				3. CATEX Form	3. CATEX Form
	Be sure to ONLY include funds committed to Categorically Excluded				
		ines, reconstruction of			
curbs and sidewalks, re	paving of streets)				
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		CECT - (A			
	r completing the				
tne	activity convert to	exempt at 58.	34 (a)(12)?		
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https://www.hudex	cnange.into/progran	ns/environmenta	-review/floodplain-		
management/			0.5.1		
Upload FEMA	IRMette Map to in	iciude Panel No.	& Date		
✓ Fight Stop	Analysis (24 CFR Pa	et CC 20\ Unione	as black if N/A.		
Early Notice	Allalysis (24 CFK Fa	l one time 15 day	comment period		
	Early Notice (must be <u>published</u> one time, 15 day comment period) Final Notice (must be <u>published</u> one time, 7 day comment period)				
(Requirement No. 403 in PnP Manual)			3d.	3d.	
regularities 403 mm mandary			Ju.	30.	
d. Notice of Intent (Proof of Publication or Posting) (Attachment 16)				_	
		3e.	3e.		
DIST LIST (Attach	ment 17) - Distribute				
e. agencies and interested parties in relation to the activity and upload with publication				3f.	3f.
publication		3	J.,		
f. REQUEST RELEA	ASE OF FUNDS - 70				
Complete All Work	sheets for CEST a	When complete,		Env.	
upload individu	ally with supporting	ng documentation	on to OkGrants.	Env.	
upload individually with supporting documentation to OkGrants. https://www.hudexchange.info/programs/environmental-				Worksheets	Worksheets
	related-laws-and-				
1. Airport Hazards	5.Coastal Zone	9.Farmland	13.Sole Source		
	Mgmt.	Protection	Aquifers		
2.Coastal Barrier	6.Contamination &	10.Floodplain	14.Wetlands		
Resources	Toxic Substance	Management	Protection		
3.Flood Insurance	7.Endangered	11.Historic	15.Wild and Scenic		
	Species	Preservation	Rivers		
4.Air Quality	8.Explosive &	12. Noise	16.Environmental		
	Flammable	Abatement & Control	Justice		
	Facilities	Control			

4. Environmental Assessment (**EA**) Review (Primarily used for **NEW** construction)

Complete EA (HUD/ODOC Form) using information from prepared "Resource Worksheets".

- a) Historical letters of concurrence (State & Tribal)
- b) Archaeological letter of concurrence
- Part of the review is **Floodplain** Management, the "Resource Topic Page & Worksheet" provides guidance to determine if the activity is located in the 100- or 500-year floodplain. If any portion of the project is located in the floodplain or wetland, 5-step or 8-step review process shall be performed requiring **two publications** for public comment **1)Early Public Review & 2)Justification for locating project in a floodplain**
- **d)** Prepare and Post a **Combined Notice** A Finding of No Significant Impact to the Environment and Intent to Request a Release of Funds.
- e) Distribute the Combined Notice to interested parties
- **f)** Chief Elected Official **Certifies** the Review of all Environmental Documents, Prepares and **Executes** the EA Form and 7015.15 Reguest for Release of Funds (HUD/ODOC Forms).

Items 5 thru 11 are other documents required before ODOC can provide a "Release of Funds".

4. Complete and Upload Environmental Assessment Form:	4. EA Form	4. EA Form
Environmental Assessment Checklist (<u>Attachment 14</u>):		
a. Historical Clearance Letter (SHPO & THPO) https://www.okhistory.org/phpo/section106.htm https://www.okhistory.org/phpo/tribal106	4a.	4a.
b. Archaeological Survey Letter - https://www.ou.edu/archsurvey/cultural- resource-management/agencies-and-applicants	4b.	4b.
c. Floodplain Management- https://www.hudexchange.info/programs/ environmental-review/floodplain-management/ Upload FEMA FIRMette Map to include Panel No. & Date	4 c.	4c.
Eight Step Analysis (24 CFR Part 55.20) <u>Upload or blank if N/A;</u> Early Notice (must be <u>published</u> one time, 15 day comment period)		
Final Notice (must be <u>published</u> one time, 7 day comment period)		
(Requirement No. 403 in PnP Manual)		
d. Combined Notice (Attachment 18)	4d.	4d.
(Proof of Publication or Posting)		
DIST LIST (Attachment 17) - Distribute the Notice to the appropriate e.	4e.	4e.
agencies and interested parties in relation to the activity		
and upload with publication	41.	41.
f. REQUEST RELEASE OF FUNDS - 7015.15 (Attachment 15)		
OTHER REQUIREMENTS (if applicable)		
 Leverage/Matching Funds- (<u>Attachment 20</u>): UPLOAD Leverage Confirmation & supporting document as applicable. 	5.	5.
Ortodo teverage communication a supporting document as applicable. Insurance & Bonding (as applicable) UPLOAD Items:	6.	6.
Evidence of City/County general liability insurance coverage	0.	0.
Evidence of City/County bonding		
7. Anti-Displacement Plan (Attachment 22)	7.	7.
UPLOAD Executed Plan	_	
Fair Housing Activity - <u>UPLOAD</u> one (1) activity: Refer to Policy and Procedure Manual - Policy 404	8.	8.
9. Section 3 - if applicable UPLOAD Resolution & Plan adopted	9.	9.
by sub-recipient: Refer to Policy and Procedure Manual - Policy		-
404	10.	10.
10. Engineer Acknowledgment- (Attachment 21)		
LIPLOAD Executed Form	11.	11.
11. ODEQ Permit to Construct - UPLOAD for W/S Eng. Contracts & Part II Contract Conditions as applicable: Leave blank if N/A		

Preparer Name, Title, & Agency (Typed)	ODOC Reviewer Name & Title
Date	Date

2021

Exempt and Categorically Excluded Not Subject To (CENST) Form:

Forms can be located in the CDBG-CV Policy and Procedure Manual or here:

https://www.hudexchange.info/resource/3141/part-58-environmental-review-exempt-or-censt-format/

Environmental Review for Activity/Project that is Exempt or Categorically Excluded Not Subject to Section 58.5 Pursuant to 24 CFR Part 58.34(a) and 58.35(b)

This is a suggested format that may be used by Responsible Entities to document completion of an Exempt or Categorically Excluded Not Subject to Section 58.5 environmental review.

Project Information

Project Name: Corona Covid Relief Program

Responsible Entity: City of Corona

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: 19864 CDBG-CV1

Preparer: Mr GoAway Corona, Grant Administrator

Certifying Officer Name and Title: Robert Corona, Mayor

Consultant (if applicable):

Project Location: Metro

Description of the Proposed Project [24 CFR 58.32; 40 CFR 1508.25]:

Due to the COVID-19 public health emergency, residents continue to sustain devastating economic losses causing the need for immediate assistance. To make a positive impact in the lives of Corona residents \$500,000 will be used for Utility Assistance, Nutrition and Mental Health has been appropriated to provide assistance to residents.

Exempt and CENST Form:

To determine Level of Environmental Review Determination, use the U.S. Department of HUD Office of Environmental and Energy Handbook of Laws, Regulations, and Executive Orders for HUD Environmental Compliance provided in the CDBG-CV Policy and Procedure Manual.

Level of Environmental Review Determination:

Activity/Project is Exempt per 24 CFR 58.34(a): (3) Administrative and management services. *Project funds will be used to pay for grant administration and consulting services.

Activity/Project is Categorically Excluded Not Subject To §58.5 per 24 CFR 58.35(b): (2) Supportive services including, but not limited to, health care, housing services, nutritional services, short-term payments for rent/mortgage/utility costs. *Project funds will be used for utility assistance, nutrition and mental health services.

Funding Information

Grant Number	HUD Program	Funding Amount
19864	CDBG-CV1	\$400,000

Estimated Total HUD Funded Amount:

Utility Assistance: \$170,000 Nutrition Assistance: \$106,000 Mental Health: \$100,000

Activity Delivery Costs: \$24,000

Total HUD funds: \$400,000

This project anticipates the use of funds or assistance from another Federal agency in addition to HUD in the form of (if applicable):

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

City of Corona Leverage: \$100,000

CDBG-CV1: \$400,000

Total HUD and non-HUD funds: \$500,000

Exempt and CENST Form:

Compliance with 24 CFR §50.4 and §58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4 and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE OF	RDERS, AND R	REGULATIONS LISTED AT 24 CFR §58.6
Airport Runway Clear Zones and Accident Potential Zones	Yes No	N/A. This Activity is not a purchase or sale of an existing property.
24 CFR Part 51 Subpart D		
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No	N/A. Oklahoma is not is Coastal Barrier Resource Area.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No	N/A. Oklahoma does not require Flood Insurance as the State of Oklahoma is a Federal Formulated Grant Funded State from the US Dept. of Housing and Urban Development per 24 CFR Part 58.6(a)(3)

Exempt and CENST Form:

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
None	

Preparer Signature:

Date: 4/19/21

Name/Title/Organization: City of Corona Grant Administrator

Responsible Entity Agency Official Signature:

puzh

Date: 4/19/21

Name/Title: Mayor of Corona

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

Categorically Excluded Subject To (CEST)



U.S. Department of Housing and Urban Development 451 Seventh Street, SW Washington, DC 20410 www.hud.gov

espanol.hud.gov

Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5

Pursuant to 24 CFR 58.35(a)

This is a suggested format that may be used by Responsible Entities to document completion of a Categorically Excluded Subject to Section 58.5 environmental review.

Project Information

Project Name: City of Covid Public Facility Rehab

Responsible Entity: City of Covid

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: 19865 CDBG CV

Preparer: Mr. Covid Vaccine, Grant Administrator/Consultant

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

Certifying Officer Name and Title: Peggy Covid, Mayor

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): Mr. Covid Vaccine

Direct Comments to: Mr. Covid Vaccine

Project Location: Public facilities located at:

109 E. Springer 201 N. Division

407 Commerce Blvd.

The City of Covid Replacement of HVAC Systems and Window Replacements Project will be paid with CDBG-CV funds in the amount of \$500,000. The City is contributing \$100,000. Compliance with the National Environmental Protection Act of 1969 (NEPA) is required. The City of Covid will use COVID rehabilitation assistance funds to install HVAC systems with filtration systems and replace inoperable windows in 3 various buildings throughout the city that are heavily utilized by City personnel and the public on a regular basis. The ages of the buildings range from 1940 to 2011. The HVAC units and window replacements are needed to address the lack of ventilation and

units and window replacements are needed to address the lack of ventilation and filtration needed to mitigate risks of airborne Coronavirus particles, improve indoor air quality, rapidly turn over fresh air within the buildings, and help to prevent the spread of

https://www.hudexchange.info/resource/3139/part-58-environmental-review-cest-format/

Level of Environmental Review Determination:

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:

58.35(a)(iii) In the case of non-residential structures, including commercial, industrial, and public buildings:

- (A) The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; and
- (B) The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.

Funding Information

Grant Number	HUD Program	Funding Amount
18472	CDBG-CV	\$500,000

Estimated Total HUD Funded Amount:

\$500,000- Rehab assistance

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$500,000

\$100,000 -Match/leverage \$600,000 Total project cost

ODOC CD9°CDBG-CV4+technical Assistance (Updated Mat/2022)

All worksheets must be completed to confirm compliance determinations.

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE OF & 58.6	RDERS, AND R	EGULATIONS LISTED AT 24 CFR 50.4
Airport Hazards	Yes No	See attachment 1- Project is replacement of
24 CFR Part 51 Subpart D		existing HVAC systems and windows in 3 buildings- There are no military airports

			within 15,000 feet or civil airports within 2,500 feet of the projects sites. See attached airport maps.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes	No	See attachment 2- Project is located inland.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC	Yes	No 🗵	See attachment 3- The project has an exception to the flood insurance purchase requirements, 24 CFR 58.6(a)(3) because the project is funded by HUD and is a formula grant made to the State.

•	•	-	
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5			
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No	See attachment 4- Nonattainment shows none of Oklahoma is in a nonattainment area.	
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No	See attachment 5- Project is located inland.	
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No	See attachment 6- Project is not located in an area of known history of toxic or hazardous materials. Site visit on 5/18/22 validates no toxic or hazardous materials are present.	
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No	See attachment 7- Generic clearance letter used includes the following language: "Rehab or renovation activities associated with existing structures (e.g. houses, buildings) are permitted.	
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No	See attachment 8- On site visit performed on 5/18/22 shows no above ground tanks were near project area.	
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections	Yes No	See attachment 9- The project does not convert land use.	

No	See attachment 10- None of the 3 buildings included in project are located in a floodplain. See attached floodplain map.
_	.

Release of Funds (CEST)

Important:

If there are no mitigation measures the project can convert to exempt. (e.g., project located in a floodplain)

If there are mitigation measures, the project cannot convert to exempt and the subrecipient must publish a Notice of Intent (NOI) and Request Release of Funds (RROF) also known as form 7015.15.

Field Inspection (Date and completed by): 5/18/22 by Mr. Covid Vaccine Summary of Findings and Conclusions: There will be no negative impacts to the natural or manmade environment.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
	No mitigation measures are required.

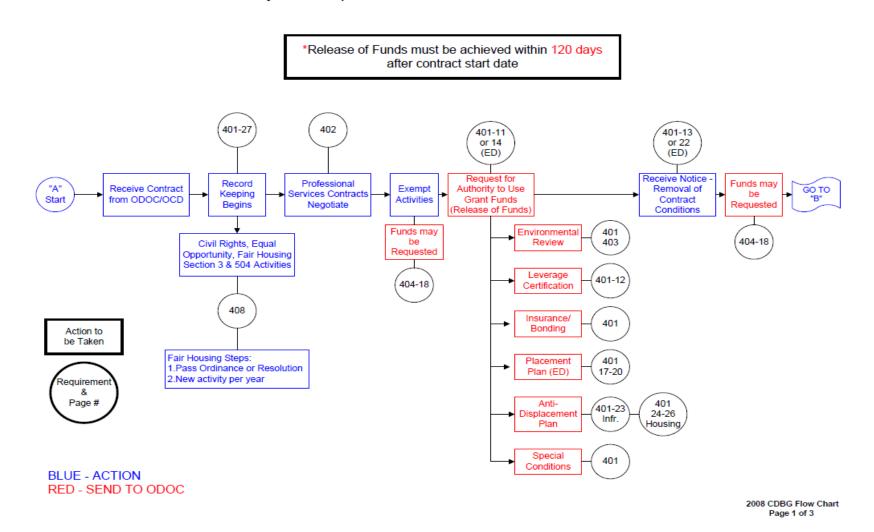
Determination

This categorically excluded activity/project converts to Exempt, per 58.34(a)(12) because there are
no circumstances which require compliance with any of the federal laws and authorities cited at
§58.5. Funds may be committed and drawn down after certification of this part for this (now)
EXEMPT project: OR

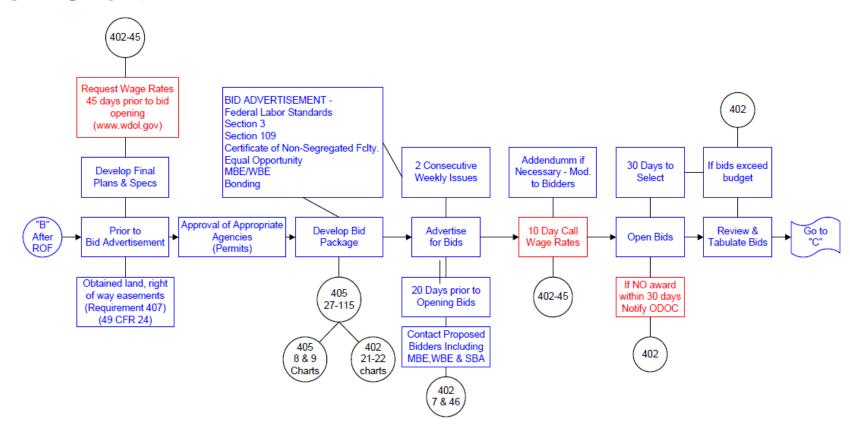
This categorically excluded activity/project cannot convert to Exempt because there are circumstances which require compliance with one or more federal laws and authorities cited at §58.5. Complete consultation/mitigation protocol requirements, publish NOI/RROF and obtain "Authority to Use Grant Funds" (HUD 7015.16) per Section 58.70 and 58.71 before committing

Construction Flow Chart

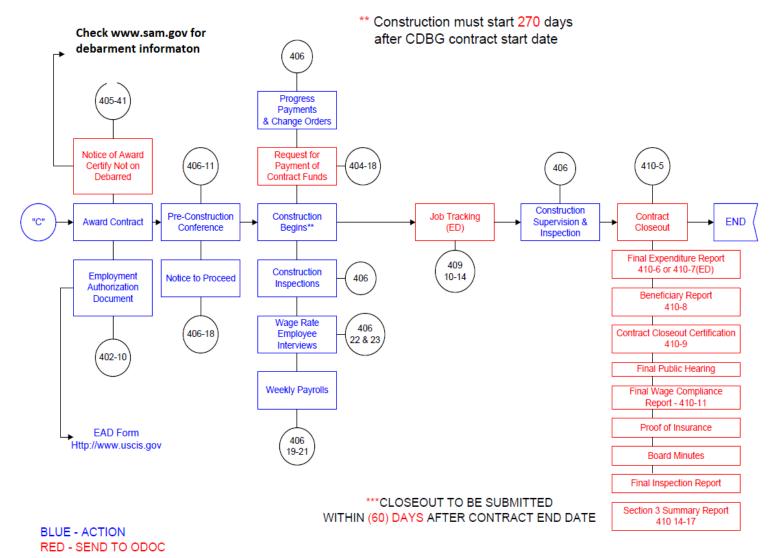
Community Development Block Grant Construction Flow Chart



Construction Flow Chart

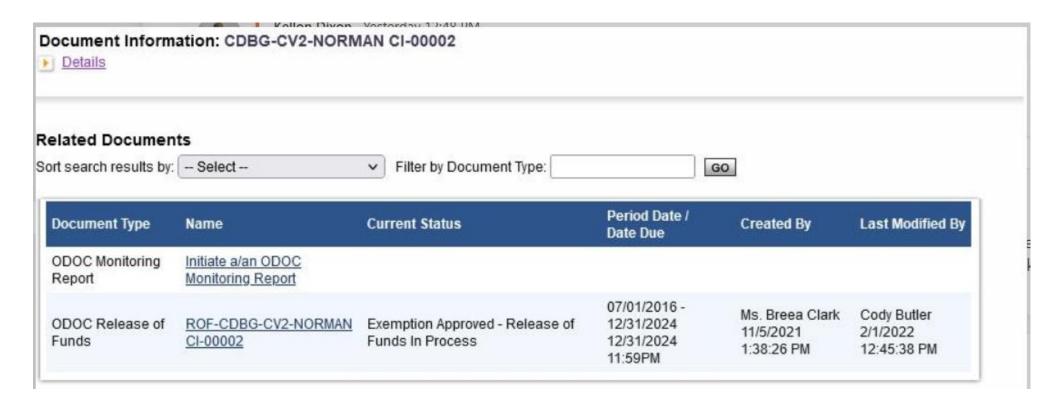


Construction Flow Chart



2008 CDBG Flow Chart Page 3 of 3

Extra step when debarment requirements have not been met or if there is other missing information:



Release of Funds Overview

□ Submit Release of Funds for Exempt/CENST activities. Examples include grant administration, engineering/architect fees, inspections and other soft costs found in 58.34 or 58.35(b);
□ After clearance has been received for Exempt/CENST activities prepare environmental review for CEST activities found in 58.35(a);
□ Submit Wage Determinations found at <u>www.sam.gov</u> 45 days prior to bid;
□ Request 10-day call ten days prior to bid opening to verify wage rates;
☐ After bid opening obtain approval for Notice of Award;
□ Complete Release of Funds;
□ Begin construction.

Civil Rights, Fair Housing and Section 3

Fair Housing

The Fair Housing Act prohibits discrimination in housing opportunities for nine (9) protected classes:

Race Gender

Color Disability

Age Family Status

Religion Sexual Orientation

National Origin

Fair Housing Requirement

ODOC requires all CDBG grant recipients to:

* adopt a Fair Housing Ordinance or pass a Fair Housing Resolution as the first step in affirmatively furthering fair housing.

* undertake at least one (1) new activity per year to further fair housing.

Fair Housing requirements examples

- Have a written local complaint and monitoring process and notify the public of its existence through newspaper advertisement, or through notices in utility statements.
- Designate April or any month as "Fair Housing Month" by Proclamation or Resolution along with another sponsoring activity
- Newspaper advertisements, marquis displays or public service announcements
- Poster contest, essay writing contest at local schools
- Display items at local businesses



When it comes to housing, little things shouldn't make a difference.

If you have children or are pregnant and a landlord refuses to rent to you, requires a higher security deposit, limits the use of facilities, or says you can only live in certain areas of a housing complex... that could be discrimination. And housing discrimination because of familial status is against the law.

> If you believe you may be a victim of housing discrimination, contact HUD or your local Fair Housing Center:

Visit www.hud.gov/fairhousing or call the HUD Hotline **1-800-669-9777** (voice) **1-800-927-9275** (TTY)

Your Choice. Your Right. Your Home. 📵



FHEO Resource https://www.hud.gov/program offices/fair housing equal opp/marketing

- Posters
- Social Media Advertisements
- Brochures
- Booklets
- Flyers
- Handouts

SECTION 504 OF THE REHABILITATION ACT OF 1973

Summary:

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability in programs and activities conducted by HUD or that receive financial assistance from HUD.

Purpose:

- In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing HUD has a statutory responsibility under Section 504 to ensure that individuals are not subjected to discrimination o the basis of disability by any program or activity receiving HUD assistance.
- Section 504 charges HUD with enforcing the right of individuals to live in federally subsidized housing free from discrimination on the basis of disability.
- Further, Section 504 covers employment discrimination based on disability and requires HUD and HUD-assisted agencies to make reasonable accommodations for the know physical or mental limitations of an employee or qualified applicant.
- It covers all HUD programs except for mortgage insurance and loan guarantee programs.



SECTION 109 OF THE HOUSING AND COMMUNITY DEVELOPMENT (HCD) ACT OF 1974

Summary:

Section 109 of the HCD Act of 1974, Title I, prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex within Community Development Block Grants (CDBG) programs or activities

Purpose:

- In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing. HUD has a statutory obligation under Section 109 to ensure that individuals are not subjected to discrimination on the basis of race, color, national origin, disability, age, religion, or sex by recipients of CDBG funds.
- Section 109 charges HUD with enforcing the right of individuals to live in CDBG-funded housing free from such discrimination.
- However, this additional statutory authority only applies to CDBG and allied programs, such as Section 108 loan guarantees and the Historically Black Colleges and University program.



Title II of the Americans with Disabilities Act of 1990

Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968

The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Section 3 Requirements

Section 3 of the Housing and Urban Development Act of 1968 requires that grantees, sub grantees, sub recipients, contractors, subcontractors, and/or developers funded in whole or in part by CDBG-CV funding, to the greatest extent feasible, extend hiring opportunities and contracts to Section 3 eligible residents and businesses. Section 3 eligible residents are low-and very low- income persons, particularly those who live or reside in public or government assisted housing.

For those entities that receive more than \$200,000 in HUD CDBG-CV assistance, and contractors that are awarded covered contracts that exceed \$200,000, ODOC requires that an approved Section 3 plan be in place before the project is awarded and approved.

Important: If a construction contractor has identified as a Section 3 Business, labor hours will need to be tracked. These forms will soon be added to the CDBG-CV Policy and Procedure Manual. Stay tuned.

Procurement



Procurement Requirements

Cities and Towns are required to follow their own procurement procedures as established by local ordinance for the purchase of all goods and services. In the absence of procurement procedures, Cities and Towns should use the procurement requirements outlined in the CDBG-CV Policy and Procedure Manual.

- Small Purchases \$5,000 or less in aggregate
- ➤ Between \$5,000 and \$50,000 Must receive in writing at least 3 bids or quotes.
- > \$50,000+ Must obtain Sealed Bids

Counties are required to follow the procedures as defined in O. S. 19, et.al. County purchasing practices in Oklahoma are regulated by Sections 1500 through 1505 in Title 19, Chapter 33, "County Purchasing Procedures", of the Oklahoma Statutes, commonly referred to as the County Purchasing Act. These practices are also regulated by the "Public Competitive Bidding Act" (PCBA) in Title 61, Sections 101 through 138 in the Oklahoma Statutes. These Statutes are revised each year by the Oklahoma Legislature to keep them current and beneficial.

- ➤ Small Purchases \$10,000 or less in aggregate
- > \$10,000 + Must advertise, solicit and obtain Sealed Bids

Procurement Requirements

24 CFR 570.489(d): Fiscal controls and accounting procedures.

A State/Subrecipient shall have fiscal and administrative requirements for expending and accounting for CDBG funds that:

- Are specific enough to ensure compliance
- Ensure that CDBG funds are spend for reasonable and necessary costs;
- Ensure that CDBG funds are not used for general expenses

A State/Subrecipient may satisfy this requirement by:

- Using requirements applicable to the use of its own funds;
- Adopting new requirements; or
- Applying the provisions in 2 CFR part 200 (in which case, the provisions of part 200 apply to the State and its sub-recipients)

Procurement Requirements

Tip: As a good rule of thumb, where local and state rules address the same matter/requirements as 2 CFR part 200, **follow the most restrictive** standard unless it conflicts with the Federal Requirement (if there is a conflict, follow Part 200 rule or contact ODOC for guidance)

Procurement transactions must be handled in a manner that provides "full and open competition" (2 CFR 200.319)

Please refer to the CDBG-CV Policy and Procedure Manual for more detail.

Low to Moderate Income (LMI)Tracking

Low to Moderate Income

Two Ways to Verify LMI

- Beneficiary-by-Beneficiary: Primarily for individual and household level services as they are provided.
- Target Area: Only necessary for area wide services. If this method is used, only new 2022 surveys will be accepted.
 - Example: A community would like to complete rehab on an existing public facility but does not automatically qualify at least 51% LMI. In this scenario, the community would need to obtain new income surveys to prove LMI eligibility in the target area.

Low to Moderate Income (LMI)

LMI Beneficiary-by-Beneficiary Tracker

- The Beneficiary-by-Beneficiary Tracker (BBT) should be used to track LMI information for individual services.
- BBT tracks information such as:
 - □ Name
 - □ Address
 - ☐ Type of Assistance
 - ☐ Amount of Assistance

- ☐ Duplication of Benefits / Other
 - Assistance
- □ COVID Tieback
- LMI Verification

Note: If working with a Community Action Agency or Non-profit organization make sure they are documenting LMI correctly.

Low to Moderate Income (LMI)

When tracking beneficiaries on the LMI Beneficiary-by-Beneficiary Tracker form, group all activities together. Ex: All utility bills paid should be grouped together and totaled at the bottom, then all rental bills paid should be grouped together and totaled.

When tracking tie back to COVID, <u>Presumed Benefit is not a valid response</u>. Please explain the reasoning for why they are a presumed beneficiary such as elderly, disabled, or abused children.



Low to Moderate Income (LMI) Beneficiary Tracker

LMI Beneficiary by Beneficiary Tracker

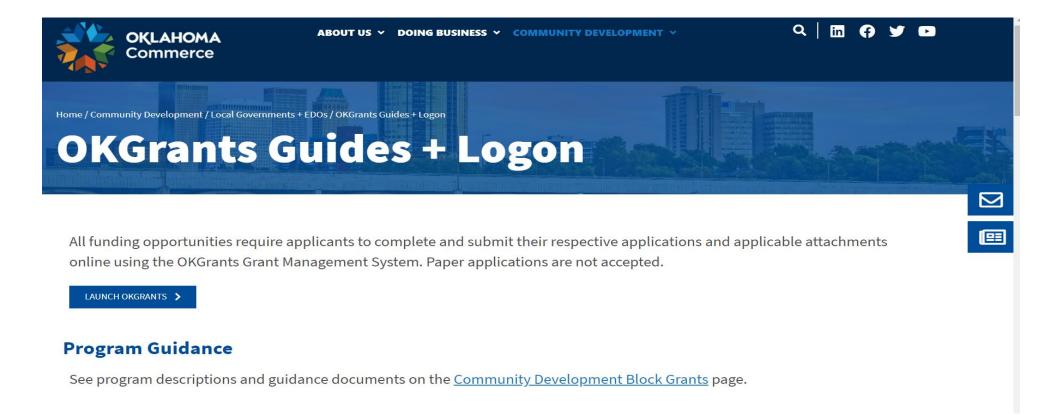
Project Detail Report

On-going COVID Assistance Details (Note: No direct payments to clients) **Client Details** Assistance Details **COVID Eligibility Certification** Duplication Client of Benefits: Address Were other Total CDBG Within Within Household LMI sources of Total \$ Target assistance Target Income: Eligible? Client Type of Amount of Address to Mail Date of Date Service were Service <50% < 80% Client Name or Initials or # in # of Meals available? <80% MHI Narrative - Economic impact due to Zip Assistance Assistance Assistance Assistance Assistance Area? Area? Y or Assistance Identification # Client Address COVID Household Served Code Given Paid to: Payment Application Paid Y or N Y or N MHI Y or N Ann Smith or A.S. or Client 123 Rook Lane, ABC. 1111 Main St. Olympia. Vorks in a restaurant and his hours were reduced 5 420 98502 Rent **\$** 3.000.00 6/2/2020 6/30/2020 ₹50% 98502 due to COVID, they still did to-go orders, so it Olympia Apartments: didn't stop entirely, but was reduced by half. 7777 Main St. Ullympia. 1,500.00 ABC Apartments 7/23/2021 7/23/2021 Υ Florence L 30 B St 73105 Rent N Υ <50% Υ Disabled/High Risk 7777 Main St. Ulympia, 1Prince Ave ABC Apartments 7/23/2021 Υ Υ Υ Elderly Buitron B 73105 Rent 900.00 7/23/2021 N <50% 1111 Main St. Ulympia. 73105 1,600.00 ABC Apartments 7/23/2021 7/23/2021 Liesa P. 3NSt Rent <50% Reduction of income/Loss of hours **Total Rent** 4.000.00 1111 Main St. Olympia 73105 ABC Apartments 7/23/2021 7/23/2021 Υ Υ James G 32 Oak Mortgage N <50% Temporary Lay-Off -Furlough 7777 Main St. Ulympia. 1,200.00 ABC Apartments 7/23/2021 7/23/2021 Υ Υ McDowell H. N 14th St 73105 Mortgage <50% Disabled/High Risk 2,800.00 **Total Mortgage** 1111 Main St. Olympia 450.00 ABC Apartments Υ Christin G 07 S 9th 73105 Utiltiy 7/26 2021 7/26/2021 N Υ <50% Υ Reduction of income/Loss of hours 7777 Main St. Ulympia. 73105 379.00 ABC Apartments 7/26/2021 7/26/2021 Υ Υ <50% Υ Elderly Amber G. 90 N Lot Utilty 7777 Main St. Ulympia. 250.00 ABC Apartments 7/26/2021 7/26/2021 Υ <50% Disabled/High Risk Lesiree P. SPalm 73105 Utility 1,079.00 **Total Utility**

OKGrants



OKGrants



https://www.okcommerce.gov/community-development/local-governments-edos/okgrants-guides-logon/

OKGrants Life Cycle



Program Implementation includes all phases after the contract has been awarded such as:

- ✓ Release of Funds / Environmental Review
- ✓ Advance Request / Reimbursement Claims
- ✓ Monthly Expenditure Reports
- ✓ Quarterly Performance Reports
- ✓ Monitoring

ODOC CD | CDBG-CV rechnical Assistance (Updated May 2022)

OKGrants



Resources

Program Guidance

See program descriptions and guidance documents on the <u>Community Development Block Grants</u> page.

Module Walkthroughs



Contract Modification



Request for Funds



Reimbursement Claim



Expenditures



Grant Monitoring



Closeout



Initiate Release of Funds

Guides + Manuals



CDBG Project Management Guide

October 2021 CDBG Manual



OKGrants for New Users

A brief presentation providing an introduction to the Grant Management System.



OKGrants FAQ/Troubleshooting

A selection of answers and hints for the most common questions and issues.



Status Glossary

A breakdown of the various document statuses and their meanings.



OKGrants Subgrantee User Manual

An in-depth look at the processes and capabilities of the Grant Management System.

For questions regarding the OKGrants Grant Management System contact Cody Butler at 405-213-8667 or cody.butler@okcommerce.gov.

OKGrants Walkthroughs and Roles

Step-by-step walkthroughs can be obtained from within the OKGrants system or on our website okcommerce.gov OKGrants Guides.

Subrecipient Roles:

- Agency Administrator Handles user accounts only;
- Viewer Cannot edit or save. Used for auditors;
- Writer Can edit and save, but cannot submit anything;
- Financial Officer Can, edit, save and submit;
- Authorized Official Full permissions for everything.



- OKGrants is required for the submission of applications, implementation of projects and subsequent closeout. It is important to note that some documents will be completed on forms that are programmed into OKGrants such as reimbursement claims and quarterly reporting. Certain other documents may be completed by the Grant Recipient and then uploaded into OKGrants. All paper documents should be maintained by the subrecipient at their primary office.
- All Grant Recipients are required by State statute to track Federal dollars by fund. This simply means that a separate set of accounting records must be set up for each CDBG contract received,
- All entries recorded in the cash disbursements journal must be traceable to some form of source documentation, e.g., invoices, partial pay estimates, employee time sheets, etc. Additionally, all original documentation should be filed in an orderly manner and readily available for review in the event ODOC performs a financial monitoring.
- If leverage funds are used, they must be tracked and reported monthly.
- Non-Collusion Affidavits are required to be attached to all contracts for \$25,000 or more
- The most important thing to remember is that you can only expend funds on the items that are listed in the detailed budget submitted with your application for funding

Advance Request Requirements

Upload the following for every advance request through OKGrants:

- 1. Reimbursement Claim (attached to the CDBG-CV Policies and Procedures Manual);
- Purchase Order If POs are not used, the first advance request should include an explanation on why POs are not used and what process is outlined for approved purchases;
- 3. Invoice(s);
- 4. LMI Beneficiary by Beneficiary Tracker;
- 5. Employee Timesheets required if advance request includes administrative costs (also called Activity Delivery Costs). This does not apply if you are a City employee being paid from the City budget.



Note: Due to limitations within OkGrants, the term Advance Request and Reimbursement Claim are used interchangeably in the CV program. Both terms are the same.





Advance Request File Organization

When an advance request is submitted, files should be organized properly for review. Files should be uploaded in the following manner:

- Reimbursement Claim
- 2. Purchase Order
- 3. Invoice
- 4. LMI Tracker
- 5. Timesheets (if applicable)
- 6. Equipment Inventory (if applicable)

Advance Request File Organization

Files should also be labeled accordingly in OkGrants.

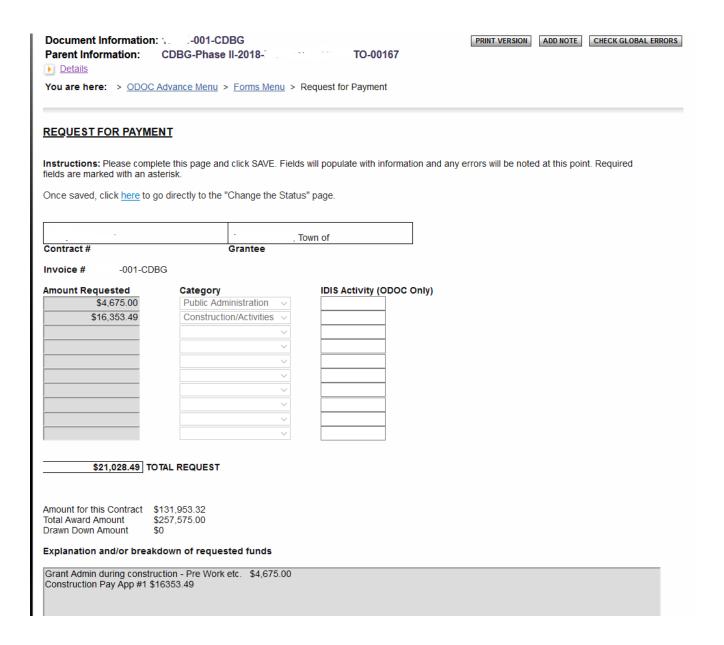
UPLOADS	
Instructions: Upload a file and complete the description, click Save To remove a file, select the DELETE checkbox, clear the description, and click \$	Save
Refer to your complete application packet for guidance on up-loadable attachm	ents.
Description	SAVE/NEXT NEXT PRINT VERSION ADD NOTE CHECK GLOBAL E
Reimbursement Claim Form	Browse No file selected. DELETE 821025_607135-reimbursementclaimform2.pdf
Expense Documentation - PO and Invoice	Browse No file selected. DELETE 821025_607135_2-expensedocumentationclaim2.pdf
LMI Beneficiary Tracker	Browse No file selected. 821025_607135_3-LMltrackerclaim2.pdf
Expense Information from invoice totaling \$25,436.37	Browse No file selected. DELETE 821025_607135_4-CopyofOct2021CDBGInvoiceClientServices.pdf
Timesheets	Browse No file selected. DELETE 821025_607135_5-NovOctTimesheets.pdf

Pay Advances

All funds requested on are present on pay advance.

Make sure you have enough funds to request.

Upload all supporting documents



Oklahoma | CDBG-CV Technical Assistance

Reimbursement Claim Form

For any entity that is offering beneficiary services for multiple months or more than one activity such as receiving assistance for utilities and rent, please do not double count persons receiving that service or assistance. For example, if a household receives utility assistance for 6 months that beneficiary is counted as 1 household on the Reimbursement Claim Form, as well as in all Quarterly Performance Reports. The same would apply if that same individual receives rental assistance, the beneficiary or household should only be counted once when tracking LMI information.

Reimbursement Claims

- Reimbursement Claims will need to be submitted with each advance request.
- Information from Reimbursement Claims will also be used on the Quarterly Performance Report (QPR).

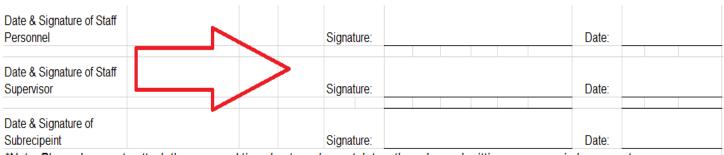
CDBG-CV Reir This form should be submitted with each reimbursement Must be signed by Authorized Official of Grant Recipient	t claim for CDBG-CV funds. I		ice/s with claim.
Amount of claim:	CDBG-CV Contract #	<u>19864</u>	
<u>\$75,000</u>			
Type of Assistance	<u>Benefici</u>	aries Assisted	Amount Expended For Assistance
Rental/Mortgage Assistance (Example)			
# Of Rentals Assisted		1,500	\$25,000.00
# Of Mortgage Assisted		20	\$50,000.00
Total # Of Persons/Households Served	152	20 Persons	
Total # of LMI Served		775	
Total Amount Expended for Assistance			\$75,000.00

Personnel Timesheets

 For staff that perform work on CDBG-CV eligible activities, a timesheet will need to be submitted for reimbursement. (Note: It would be best, but not required, to submit these timesheets monthly to ensure compliance and documentation requirements.) Ex. Community Action Agency staff or non-profit organization staff time on project. This does not apply to City staff being paid from the City budget.

EMPLOYEE NAME	POSITION TITLE	WORK PERFORMED	DATE	PAY				y of We Week 1				Total Number	Total Program	PROGRAM REIMBURSEABLE
EMPLOTEE NAME	FOSITION TITLE	WORK PERFORMED	R	RATE	M	т	Wed.	Th.	Fri.	Sa.	Su.	of Hours		PAY
				\$0.00	Г	Г	Г	Г	Г	Г	Г	0	0	\$0.00
				\$0.00	Г	Г	Г	Г	Г	Г	Г	0	0	\$0.00
			Ī	\$0.00	Г	Γ	Г	Г	Г	Г	L	0	0	\$0.00
				\$0.00	Г	Г	Г	Г	Г	Г	Г	0	0	\$0.00
				\$0.00	Г	L	Г	Г	L	Г	L	0	0	\$0.00
				\$0.00	Г	Г	Г	Г	Г	Г	Г	0	0	\$0.00
				\$0.00	Г	Г	Γ	Г	Г	Г	Γ	0	0	\$0.00
		Total Number of Hours	Worked	i -								0.0	0.0	\$0.00

Make sure timesheets are signed accordingly.
 Incomplete timesheets will not be processed for payment.

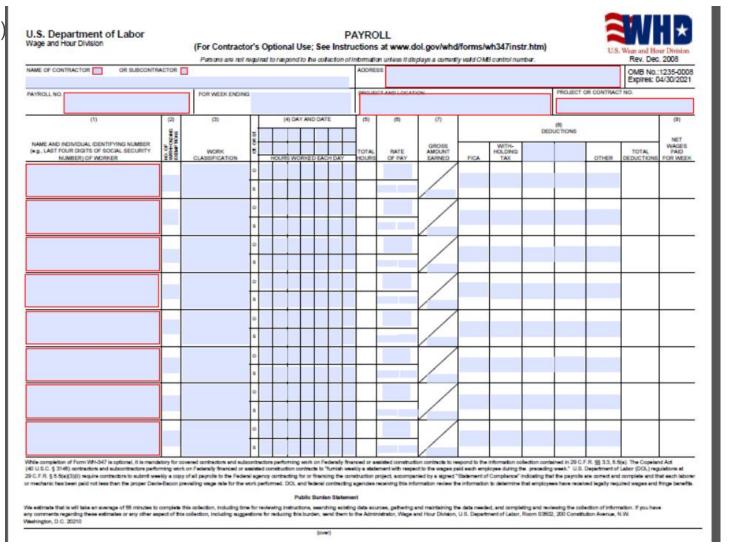


^{*}Note: Please be sure to attach the approved timesheets and pay stub together when submitting program reimbursements.

Note: Personnel timesheets should not be used for construction activities. Wage and Hour Division (WHD) Payroll timesheets should be used for construction projects to ensure Davis Bacon compliance.

Davis Bacon applies to construction contracts over \$2,000. Subrecipients must ensure construction contractors are paying the correct wage rates to their employees.

Weekly payrolls must be submitted with each drawdown request.



Monthly Expenditure Report (MER)

- Monthly Expenditure Report must be entered on OKGrants by the <u>10th of every month</u> following a month in which there has been a draw, expenditure, or cash balance of CDBG funds.
- Leverage expenditures must also be included on the report. Leverage expenditures must be reported when incurred, if there has not been an expenditure of leverage funds please place a zero in the appropriate line item. If there are no CDBG expenses to report during the month, a report for leverage expenditures only must be submitted if leveraged expenditures occurred. Along with the submitted Leverage Expenditure Report, supporting documentation such as invoices, receipts and cancelled checks must be uploaded in OKGrants.
- Timely submission of the Monthly Expenditure Report is important. Requests for funds will not be processed if there are any delinquent reports outstanding.

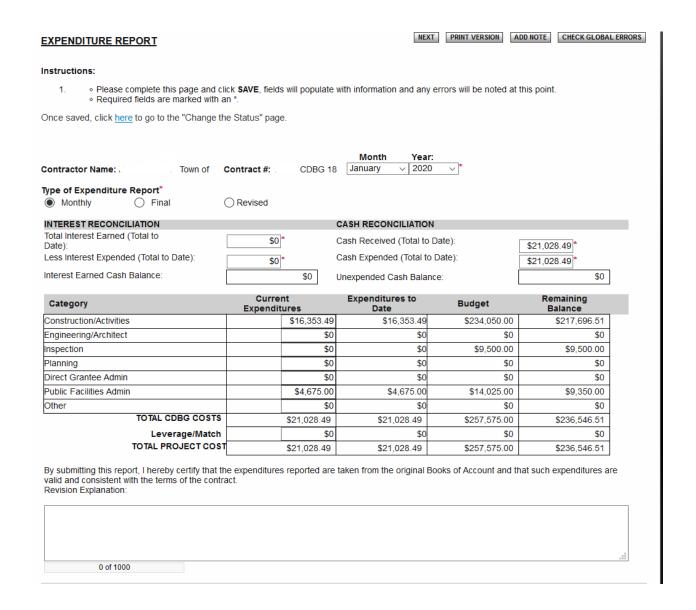
Expenditure Report

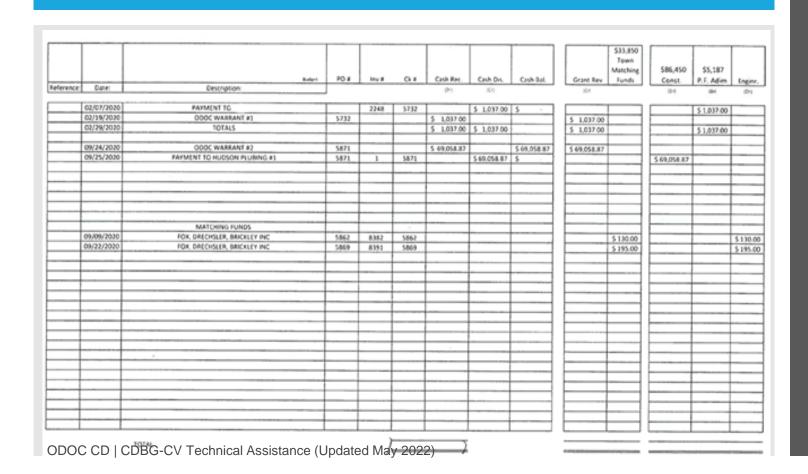
Monthly Vs. Final

Month and year selected the expenditure accrued

Budget Item

Description of expenditures





- The general ledger is to remain on file and must include data from the following information:
 - Invoice
 - Purchase Order
 - Check

Timely Expenditure Requirements

FR 6218-N-01 mandates that **80** % of CDBG-CV funds must be obligated and expended **within three (3)** years of the date funds are obligated, unless a waiver is granted by HUD. **March 2023 is the deadline for this requirement.**

What does this mean for subrecipients?

- At the end of one year, the sub-recipient will have eligible expenditures and will have drawn a **minimum of ten percent (10%)** of the total contract amount.
- At the end of eighteen months the sub-recipient will have eligible expenditures and drawn a minimum of eighty percent (80%) of the total contract amount.
- At time of closeout submission, the sub-recipient will have submitted the final request for all eligible expenditures.

Quarterly Performance Reporting

- Quarterly Performance Reports (QPR) will be due by the 10th of January, April, July and October until closeout documents are submitted. This is not to be confused with the Monthly Expenditure Report (MER). A Monthly Expenditure Report must be prepared and submitted in OKGrants by the 10th of every month following a month in which there has been a reimbursement claim/advance request.
- Data entered on the QPR should be cumulative of what has been submitted on past reimbursement claims.
- If the QPR has not submitted as directed, advance request will <u>not</u> be processed.

Date of Report 11	1/10/2021				
Reporting Period (Quarter)	ul-Sep 2021	v]			
CDBG-CV Contract Number 1	CDBGCR	20			
Responsible Entity C	ity of				
Subcontractor/Sugrantee					
Contract Period Fro	om April 1, 202	21 until Mars	ch 31, 2023	}	
	FINANCIAL I	0		To Date	
		0		To Date	
Total Projected Budget from A	-	This Quarte		11 - 1111	\$1,844.50
Total Projected Budget from A Total CDBG-CV Budget	-	This Quarte \$	er		
	-	This Quarte \$	er 159,575.00		\$636,455.50
Total CDBG-CV Budget	-	This Quarte \$	er 159,575.00 638,300.00		\$1,844.50 \$636,455.50 \$1,844.50 \$1,844.50
Total CDBG-CV Budget Total Obligated	All Sources	This Quarte \$	159,575.00 638,300.00 \$915.99		\$636,455.50 \$1,844.50
Total CDBG-CV Budget Total Obligated Total Funds Drawdown	All Sources	This Quarte \$	9r 159,575.00 638,300.00 \$915.99 \$915.99		\$536,455.50 \$1,844.50 \$1,844.50
Total CDBG-CV Budget Total Obligated Total Funds Drawdown Program Funds Draw	All Sources	This Quarte \$	915.99 \$915.99 \$915.99		\$636,455.50 \$1,844.50 \$1,844.50 \$0

<u>Utility Assistance</u> Accomplishments Performance Measur	res					
This Report Period: Utility Assistance	Total Assisted This QuarterCumulative Total					
# Units Assisted - Gas	0	0				
# Units Assisted - Electricity	0	0				
# Units Assisted - Water	12	20				
# Units Assisted - Sewer	12	20				
# Units Assisted - Trash	12	20				
Total # of Persons/Households	12	20				
Total # of LMI Served	39	63				
Total \$ Reimbursed	\$915.99	\$1,844.50				

CDBG CV - SUB RECIPIENT QUARTERLY REPORT

Recapture Policy

- ODOC CDBG-CV Staff will be reviewing CDBG-CV projects regularly to make sure funds are spent in a timely manner.
- If ODOC finds that funds are not being spent in a timely manner, the recapture policy will be enforced as shown in the CDBG-CV Policy and Procedure Manual.

Budget and Contract Modifications

Budget and contract modifications are completed through OKGrants

In some instances, a subrecipient may need to modify their budget to align with program implementation. This is considered as a **budget modification**. The following is required for a budget modification in OKGrants:

- Detailed letter on letterhead from the subrecipient requesting the modification. Must be signed by the Authorized Official
- Updated Leverage Certification Form showing the amended amounts.
 Must be signed by the Authorized Official.

Budget and Contract Modifications

Budget and contract modifications are completed through OKGrants

If for some reason the subrecipient will need additional time to complete their project a **contract modification** may be requested through OKGrants. To complete a contract modification, a subrecipient must submit the following:

 Detailed letter on letterhead from the subrecipient requesting the modification. The letter must include a brief description of the reason for the change along with the month, date, and year. The letter must be signed by the Authorized Official.

Duplication of Benefits



Duplication of Benefits Requirements

Maintain beneficiary files with the following:

- Subrogation agreement or other agreement that the beneficiary signed ensuring they will pay back any funds found to be duplicative;
- Chart showing all the funding the beneficiary received because of COVID-19 (like the DOB Chart); and
- Up-to-date beneficiary contact information.
- Ensure that you are following your DOB policies and procedures in place.

All DOB information should be kept in organized files for the DOB Consultant, Ernst & Young, to easily identify all information for an applicant in one place.

Duplication of Benefits

- Utilize forms already created by keeping all information on a client in one central location.
 Have client information on types of assistance received, COVID eligibility and intake information together.
- Trackers can include serial numbers rather than identifiable information when reporting on beneficiaries where HIPAA violations could occur. The subgrantee should have all necessary identifiable information matching the given serial number in the client's files.

LMI Beneficiary by Beneficiary Tracker
Project Detail Report
CDBG-CV Contract #
As of 010052021

	On-going COVID Assistance Details (Note: No direct payments to clients)																		
	Client Details				Assistance Details						COVID Eligibility Certification						Intake Information		
Purch Orde	sse Client Name or Initials or r Identification #	Client Address	Client Zip Code	Type of Assistanc e:	\$ Monthly Payment	Total \$ Amount of Assistance Given (6 months maximum)	Assistance Paid to:		Date of Assistance Application	Date Assistance	Client Address Within Target Service Area? Y or N	sources of assistance	₩ithin Target Service Area? Y or N	Total Household Income: <50% or <80% MHI	< 80% MHI	Narrative - Economic impact due to COVID	Intake Date/time	Intake Staff Name	Approving Supervisor (if applicable)
20-XX	XX Ann Smith or A.S. or Client	123 Rock Lane, Olympia	30502	Rent	\$ 1,000.00	\$ 3,000.00	ABC Apartments	1111 Main St. Olympia. 38502	6/2/2020	6/30/2020	γ	N	Y	<50%	Y	Works in a restaurant and his hours were reduced due to COVID, they still did to-go orders, so it didn't stop entirely, but was reduced by half.		Anne Shirley	Mary Smith 5/30/20

Duplication of Benefits – HIPAA Requirements

When using CDBG-CV funds for projects offering medical/mental health services for beneficiaries, every beneficiary should have a DOB checklist filled and signed within their files by a case manager or other individual that is allowed to review client files. This checklist should verify that the client is not receiving more service than they need or a duplication of assistance.

CDBG CV CLIENT FILE DOCUMENTATION
Duplication of Benefits (DOB) CHECKLIST

Date:

Beneficiary/Client Individual Identification Number:

(Executive Director PRINTED Name)

All CDBG-CV beneficiaries should have the following DOB checklist within their files. All beneficiaries should be checked to ensure they meet the Low-to-Moderate Income threshold, have a need due to the COVID pandemic, and are not receiving a <u>duplication of benefits</u> when receiving services. **Attestation will be required by both Case**Manager/Preparer AND Executive Director.

ODOC will not ask for a client's personal information to ensure HIPAA guidelines are maintained but will require CDBG-CV sub-recipients verify that the following checklist is signed and accurate. This document will serve as verification that you, the CDBG CV grant sub-recipient, are adhering to ODOC policies and procedures concerning DOB.

Verified by: (Initials)	Information Required
	Client file with unique Individual Identification Number
	Service Entry / Exit Dates
	Proof of meeting Low-to-Moderate Income Threshold
	Proof of need due to COVID Pandemic
	Client disclosure of other types of assistance received for mental health
	Verification by mental health provider that client is not receiving a duplication of
	the same type of assistance
	Verification by mental health provider that client is not receiving more assistance
	than client's actual need
	All required client supporting documentation

testation:	
OTE: Both signatures are required	
_	and

(Case Manager/Preparer PRINTED Name)

Duplication of Benefits

Identifying and Collecting Duplication of Benefits Data

- If a duplication of benefits is found, subrecipients should do the following:
 - 1. Contact ODOC;
 - 2. Verify that beneficiary signed a subrogation agreement;
 - 3. Keep records of duplicative assistance identified;
 - 4. Follow ODOC's instructions on moving forward it will be a case-by-case scenario.

Monitoring



Monitoring

• All monitorings will be completed by using the desk monitoring method until further notice.

- Projects will be monitored on two occasions:
 - 1. Pre-monitoring- Conducted after the first reimbursement claim has been processed.
 - 2. Monitoring- Will begin after at least 50% or more of funds have been drawn.



Monitoring

- Pre-monitoring *will not* be counted against the subrecipient but will be used as a learning tool to ensure compliance.
- Like monitoring for regular CDBG, subrecipients will be notified prior to date of monitoring by email.
- A monitoring tool will be attached to the notification letter and the subrecipient will be required to respond with all required documentation by a certain date.
- All required documents should be emailed to Project Manager for review.

Desk Monitoring



900 N. Stiles Avenue Oklahoma City, OK 73104, USA 405-815-6552 | Toll Free 800-879-6552 OKCOMMERCE.GOV

December 15, 2021

Will Banks, Chairman Carter County 25 A Street NW Ardmore, OK 73402-1544

RE: **Desk Monitoring** 17345 CDBG 19

Dear Chairman Banks:

This letter serves as a notification that Taylor Huizenga from the Oklahoma Department of Commerce has scheduled a Desk Monitoring of your CDBG- CV contract on or after January 2, 2022. Your grant administrator, Tom Coins has been notified and is aware of the necessary documents that should be available for this monitoring. Attached you will find desk monitoring tool that needs to be completed, signed and documents will need to be emailed to Taylor. Huizenga@okcommerce.gov no later than January 2, 2022.

Please contact Christy Davis at 405-215-5395 if you have any questions or concerns.

Sincerely,

Desk Monitoring



900 N. Stiles Avenue Oklahoma City, OK 73104, USA 405-815-5251 | Toll Free 800-588-5959 0 KCO MME RC E-6 0 V

Community Development Block Grant (CDBG-CV) Desk Monitoring Checklist

Grantee:
Contract#:
Due Date:
In the following sections, the Grantee will need to check each <u>items</u> as applicable to their project and
answer each question. Items that are checked will need to be emailed to your project manager
atto complete your CDBG Desk Monitoring
Financial Information (Upload
Documents) CDBG -CV Grant Funds: Leveraged/Match Funds:
Leveraged Funds Source: (Town/City/County)
☐General CDBG Ledger to include match
□ Purchase Orders/Board authorized payments in accordance to 11 O.S. 17-102
☐ Non-collusion affidavit for payments of \$25,000.00 provided by the Vendor
☐ Invoices or supporting documentation for expenses
☐ Cancelled Checks — including leverage funds
□ Board Minutes of Meetings approving Purchase Orders, Invoices pertaining to above
referenced contract.
□Inter-Local or Subcontractor Agreement (CAA, Non-Profit, Etc)
☐ Reimbursement Claim
□Quarterly Report
□Inventory Form
□LMI Tracking. Random Sample (3-6 beneficiaries) to be selected by Project Manager
□ Name 1
□ Name 2
□ Name 3
□ Name 4
☐ Name 5
□ Name 6
June 2021

2. A 3. A	Vho maintains the General Ledger? (Name & Title) Are CDBG-CV funds kept in a separate account from other funding?
	are separate persons performing bank statement reconciliations and accounting duties? ☐Yes ☐No
	Are any municipal/county/city/non-profit or other employees paid with CDBG-CV funds?
	if yes please provide copies of employee time sheets to ODOC (CDBG-CV Timesheet).
□Gran Propos □ Con	(Upload Documents) nt Administrator contract along with the Direct Solicitation Proposals or Advertisement sal. nsultant ier (Food, Equipment, Etc.)
1. Public 2. Public 3. Public 4. Were a 5. Were r	pation (Upload Documents) Hearing Notice —
1. Ho 2. If s Ha	unity/Civil Rights (Provide answers & Upload Documents) ow many full-time employees? a. If 10 full time employees or more, is there a Personnel Policy in place? b. If Yes — Please upload document in OKGrants. co, does Policy and Job application include EO statement to include all groups? (Mental/Physical andicap — Age — Sex — Race — Religion — National Origin) yes — No see any EEO complaints been filed against the City? Yes — No
1. Doe 2. Have 3. Iden	Provide answers & Upload Documents) ss City have an Ordinance or Resolution?

Closeout





Closeout

- Closeout is required to be submitted within (60) days of contract expiration
- · Project must be fully monitored before it can be closed out.
- If project included an activity for data plans, the contract for the data plans must be completed before project can be closed.

Closeout

- ✓ CDBG-CV Closeout Checklist
- ✓ Proof of second public hearing
- ✓ Proof of Insurance (Equipment)
- ✓ Signed Board Minutes or Closeout Resolution



Keys to Success



Keys to Success with CDBG-CV Funds

- Follow All Checklists;
- Keep documentation and records of everything CDBG-CV related;
- Keep a detailed inventory of all CBDG-CV purchases;
- Include Federal regulations in all local CDBG-CV policies to ensure compliance;
- Look for current and future possible duplicative assistance for CDBG-CV activities;
- Make sure payments for rental assistance <u>are made to the landlord and not directly to the beneficiary;</u>
- Create processes that are easy to track and maintain.
 - Ex. It may be appropriate for the City/Community Action Agency/Non-Profit Organization to pay for services upfront and request for reimbursement from CDBG-CV.
- If you don't know, just ask. We're here to help!

Questions

ODOC Resources

https://www.okcommerce.gov/reporting-compliance/cdbg-covid-19/

Kellon Dixon Kellon.Dixon@okcommerce.gov or 405-215-5626 Donielle Suber Donielle.Suber@okcommerce.gov or 405-431-0569 Jade Shain Jade.Shain@okcommerce.gov

HUD Resources

https://www.hudexchange.info/programs/cdbg-cv/